

1 STEVEN B. WOLFSON
2 District Attorney
2 **CIVIL DIVISION**
3 Bar No. 1565
3 By: **JOEL K. BROWNING**
4 Deputy District Attorney
4 Bar No. 14489
5 By: **JEFFREY S. ROGAN**
5 Deputy District Attorney
5 State Bar No. 010734
6 500 South Grand Central Pkwy., Suite 5075
6 Las Vegas, Nevada 89155-2215
7 Telephone (702) 455-4761
7 Fax (702) 382-5178
8 E-Mail: Joel.Browning@ClarkCountyDA.com
8 E-Mail: Jeffrey.Rogan@ClarkCountyDA.com
9 *Attorneys for Defendant Clark County*

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 LISA MCALLISTER, an individual; and)
13 BRANDON SUMMERS, an individual,)
14 Plaintiffs,)
15 vs.)
16 CLARK COUNTY, a political subdivision)
17 of the state of Nevada.)
18 Defendant.)

Case No: 2:24-cv-00334-JAD-NJK

STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
FILE REPLY TO PLAINTIFFS'
RESPONSE TO DEFENDANT
CLARK COUNTY'S 12(b)(1)
MOTION TO DISMISS PLAINTIFF
LISA MCALLISTER AND HER
ADA CLAIMS FOR LACK OF
STANDING [45]
(First Request)

[ECF No. 47]

20 **IT IS STIPULATED BY AND BETWEEN THE UNDERSIGNED PARTIES,**
21 **THROUGH THEIR RESPECTIVE ATTORNEYS, THAT:**

22 1. Defendant Clark County filed its Motion to Dismiss Plaintiff Lisa McAllister and
23 Her ADA Claims for Lack of Standing [45] on June 14, 2024; Plaintiffs filed their
24 Response on June 28, 2024 [46]; Defendant's reply is due Friday, July 5, 2024; and,
25 2. Defendant Clark County may have until Friday, July 12, 2024, to reply to Plaintiffs'
26 Response [46] to Defendant Clark County's Motion to Dismiss Plaintiff Lisa
27 McAllister and Her ADA Claims for Lack of Standing [45]; and
28

1 3. Good cause exists to grant the extension because, during the upcoming week,
2 Defendant's counsel JEFFREY S. ROGAN and JOEL K. BROWNING have
3 conflicting personal and professional obligations arising from the Fourth of July
4 holiday weekend and the preparation of other dispositive motions at the close of
5 discovery in other matters; and,
6 4. This extension, which was agreed upon as a matter of professional courtesy by
7 Plaintiffs' counsel, shall not be used as a basis to argue a lack of exigency justifying
8 a preliminary injunction or temporary restraining order nor is it in any way intended
9 to delay or impair the Court's ability to issue a ruling on Defendant Clark County's
10 pending motion to stay discovery [37].

11 DATED this 2nd day of July, 2024.

12 AMERICAN CIVIL LIBERTIES
13 UNION OF NEVADA

14 */s/ Margaret A. McLetchie, Esq.*
15 Christopher M. Peterson, Esq.
16 Tatiana R. Smith, Esq.
17 4362 W. Cheyenne Ave.
18 North Las Vegas, NV 89032
19 Attorney for Plaintiffs
20 Peterson@aclunv.org
21 tsmith@aclunv.org

22 Margaret A. McLetchie, Esq.
23 Leo S. Wolpert, Esq.
24 MCLETCHE LAW
25 602 South Tenth Street
26 Las Vegas, NV 89101
27 efile@nvlitigation.com

28 Attorneys for Plaintiffs

STEVEN B. WOLFSON
DISTRICT ATTORNEY

By: */s/ Joel K. Browning*
JOEL K. BROWNING
Deputy District Attorney
Bar No. 14489
500 South Grand Central Pkwy., Suite 5075
Las Vegas, Nevada 89155-2215
Attorney for Defendant Clark County

23 IT IS HEREBY ORDERED that Defendant's reply in support of the pending
24 motion to dismiss at ECF No. 45 is due Friday, July 12, 2024.

25 Dated: July 3, 2024

26 
UNITED STATES DISTRICT JUDGE